

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

No. 20 Civ. 7311 (LAK)

**DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF
PLAINTIFF E. JEAN CARROLL'S MOTION TO DISMISS AND MOTION TO STRIKE**

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's motion to dismiss and motion to strike.

3. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the official transcript of the trial in *Carroll v. Trump*, No. 22 Civ. 10016 (S.D.N.Y.).

4. **Exhibit B** is a true and correct copy of the video recording of Carroll's May 10, 2023 interview on CNN, available at https://www.youtube.com/watch?v=PPrBo2_fyAI, which is referenced in Defendant Donald J. Trump's counterclaim, ECF 171 at 25 ¶ 3 n.5, and which is being submitted to the Court via DVD.

5. Attached hereto as **Exhibit C** is a true and correct copy of the rough transcript of Carroll's May 10, 2023 interview, which CNN has made available at <https://>

transcripts.cnn.com/show/ctmo/date/2023-05-10/segment/05 and <https://transcripts.cnn.com/show/ctmo/date/2023-05-10/segment/06>.

Dated: New York, New York
July 11, 2023



Roberta A. Kaplan